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NFL PROPERTIES LLC

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

MDL No. 2323  
Master Case No. 12-md-2323  
Individual Case No. 2:13-cv-05200

Hon. Anita B. Brody

THIS DOCUMENT RELATES TO:  
BRYAN CALDWELL, ET AL. V.  
NATIONAL FOOTBALL LEAGUE, ET  
AL.

**[PROPOSED] ORDER GRANTING  
STIPULATION TO AMEND  
COMPLAINT**

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AMERICAN SPORTS  
CORPORATION, d.b.a.  
RIDDELL/ALL AMERICAN;  
RIDDELL SPORTS GROUP, INC.  
EASTON-BELL SPORTS, INC.;  
EASTON-BELL SPORTS, LLC; EB  
SPORTS CORP.; and RBG  
HOLDINGS CORP.

1 On November \_\_\_\_, Plaintiffs and Defendants filed with the Court a Stipulation  
2 to Amend the Complaint to add additional parties.

3 IT IS ORDERED THAT:

- 4 1. Plaintiffs are granted leave to file an Amended Complaint without  
5 prejudice to or waiver of any jurisdictional argument Plaintiffs may wish  
6 to assert.
- 7 2. Defendants' consent to Plaintiffs' amendment of the Complaint to add  
8 additional plaintiffs is without waiver of—and is with total reservation  
9 of—any of their defenses, arguments, and positions with regard to the  
10 Complaint, either as it currently exists or as amended, including but not  
11 limited to arguments concerning timeliness and limitations of actions,  
12 failure to state a claim, joinder and severance, or any other arguments.

13  
14 DATED: \_\_\_\_, 2013

Hon. Anita B. Brody  
UNITED STATES DISTRICT JUDGE

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16 By: \_\_\_\_\_  
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